

REMARKS

Please cancel Claim 12 without prejudice. Claims 1-4, 6-10, 13-17, 19-24 and 26-27 are pending. Claims 1, 2, 6, 8, 15, 20 and 22 are amended herein. No new matter is added as a result of the claim amendments.

102 Rejections

The instant Office Action maintains that Claims 1-4, 6-10, 13-17, 19-24 and 26-27 are rejected under 35 U.S.C. § 102(e) as being anticipated by Chase, Jr. ("Chase;" U.S. Patent No. 5,974,238). The Applicant has reviewed the cited reference and respectfully submits that the present invention as recited in Claims 1-4, 6-10, 12-17, 19-24 and 26-27 is not shown or suggested by Chase.

Applicant respectfully submits that each of the independent Claims 1, 8, 15 and 22 recites a "conduit." Specifically, each of the independent Claims 1, 8, 15 and 22 recites a "universal conduit" that is defined in the claims as a conduit that is used with more than one or all applications known to the handheld device in lieu of a custom conduit specific to each application.

The Examiner is respectfully directed to column 19, lines 16-20 of Chase, which states "Because each desktop PIM application handles its own data differently, the data synchronization software must contain different decision logic for each supported desktop PIM until a standard synchronization API for desktop PIMs is developed" (emphasis added).

Thus, Applicant respectfully submits that Chase does not show or suggest a universal conduit as recited in the claims of the present invention.

Also, statements in the instant Office Action attempt to equate the "pseudo cache" of Chase with a conduit. Applicant recognizes that that the words of a claim are to be given their plain meaning. Applicant respectfully notes that, by plain meaning, the words of a claim must be read as they would be interpreted by those of ordinary skill in the art. Applicant also understands that pending claims are to be given their broadest reasonable interpretation. Applicant respectfully notes that the broadest reasonable interpretation must be consistent with the interpretation that those skilled in the art would reach.

Applicant respectfully submits that a cache (or a pseudo cache) and a conduit are not equivalent in either name or function. The only function of the pseudo cache that is disclosed by Chase is to snoop a programmable range of available memory address space (see column 14, lines 12-14, of Chase). Applicant respectfully submits that a person of ordinary skill in the art would not equate a conduit with a pseudo cache, and that the functionality of Chase's pseudo cache does not show or suggest the functionality the claimed universal conduit.

Therefore, Applicant respectfully submits that Chase does not show or suggest the present claimed invention as recited by independent Claims 1, 8, 15 and 22, and that Claims 1, 8, 15 and 22 are therefore in condition for allowance. As such, Applicant respectfully submits that Chase does not

show or suggest the additional claimed features of the present invention as recited in Claims 2-4, 6-7, 9-10, 13-14, 16-17, 19-21, 23-24 and 26-27 dependent on Claims 1, 8, 15 and 22, and that Claims 2-4, 6-7, 9-10, 13-14, 16-17, 19-21, 23-24 and 26-27 are in condition for allowance as being dependent on allowable base claims. Therefore, the Applicant respectfully asserts that the basis for rejecting Claims 1-4, 6-10, 13-17, 19-24 and 26-27 under 35 U.S.C. § 102(e) is traversed.

Furthermore, Claims 7, 14 and 21 recite functionality introduced by an exchange manager resident on a handheld device and used with a universal conduit. Applicant respectfully submits that Chase does not show or suggest an exchange manager that operates with a universal conduit. For this additional reason, Applicant respectfully asserts that the basis for rejecting Claims 7, 14 and 21 under 35 U.S.C. § 102(e) is traversed.

Conclusions

In light of the above remarks, the Applicant respectfully requests reconsideration of the rejected claims.

Based on the arguments presented above, the Applicant respectfully asserts that Claims 1-4, 6-10, 13-17, 19-24 and 26-27 overcome the rejections of record and, therefore, the Applicant respectfully solicits allowance of these claims.

The Examiner is invited to contact Applicant's undersigned representative if the Examiner believes such action would expedite

resolution of the present Application.

Respectfully submitted,

WAGNER, MURABITO & HAO LLP

Date: 9/8/04

William A. Zambis

William A. Zambis
Reg. No. 48,120

Two North Market Street
Third Floor
San Jose, California 95113
(408) 938-9060